

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Cargill, Inc.
1503 Wabash Ave.,
Lafayette, IN 47905-1039**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|-------------------------------------|
| Source Modification No.: 157-16119-00038 | |
| Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: June 28, 2002 |

Cargill, Inc
Lafayette, Indiana

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Permit Reviewer: Dr. Trip Sinha

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SECTION A

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SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a soybean oil extraction plant

| | |
|------------------------------|--|
| Responsible Official: | John Zoss, Plant Manager |
| Source Address: | 1503 Wabash Ave., Lafayette, IN 47905-1039 |
| Mailing Address: | 1503 Wabash Ave., Lafayette, IN 47905-1039 |
| General Source Phone Number: | 765-420-6612 |
| SIC Code: | 2075 |
| County Location: | TippeCanoe |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program |
| | Major Source, under PSD Rules; |
| | Major Source, Section 112 of the Clean Air Act |

A.2 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following insignificant emission unit and pollution control device:

- (a) One (1) hexane storage tank, identified as #809 A, with a maximum capacity of 19,000 gallons, and vented to the solvent recovery system in the extraction process or vented through the flame arrester.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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SECTION B

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GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60, Subpart Kb, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (c) Actual start-up date (within 15 days after such date); and
- (d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM, OAM. The requirements of 40 CFR Part 60 are also federally enforceable.

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GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

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available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one- (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification, which shall be submitted by the Permittee, does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

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certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

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SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (a) One (1) hexane storage tank, identified as #809 A, with a maximum capacity of 19,000 gallons, and vented to the solvent recovery system in the extraction process or vented through the flame arrester.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 The hexane storage tank does not have any emissions standard except the record keeping.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19][326 IAC 12] [40 CFR 60.116b, Part Kb]

D.1.2 Record Keeping Requirements

Pursuant to 40 CFR 60.116b, the Permittee shall keep records showing the dimension of the hexane storage tank and an analysis showing the dimension the capacity of the storage vessels for the life of the source.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Cargill, Inc.
Source Address: Cargill, Inc. 1503 Wabash Avenue,
Lafayette, Indiana 47902
Mailing Address: Cargill, Inc. 1503 Wabash Avenue,
Lafayette, Indiana 47902
Source Modification No.: SSM 157-16119-00038

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify)
- 9 Report (specify)
- 9 Notification (specify)
- 9 Affidavit (specify)
- 9 Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Cargill, Inc.
1503 Wabash Avenue,
Lafayette, Indiana 47902

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for. _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and is authorized to make these representations on behalf of Cargill, Inc.
4. I hereby certify that Cargill, Inc., 1503 Wabash Avenue, Lafayette, Indiana 47902, has constructed the
 - (a) One (1) hexane storage tank, identified as #809 A, with a maximum capacity of 19,000 gallons, and vented to the solvent recovery system in the extraction process or vented through the flame arrester.

In conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 14, 2002 and as permitted pursuant to Minor Source Modification No. 157-16119-00038 issued on

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Further Affiant said not.
I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County
and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

Signature

Name (typed or printed)

June 28, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Source Modification.

Source Background and Description

| | |
|--|---|
| Source Name: | Cargill, Inc. |
| Source Location: | 1503 Wabash Ave., Lafayette, IN 47905-1039 |
| County: | TippeCanoe |
| SIC Code: | 2075 |
| Operation Permit No.: | T 157-5863-00038 |
| Operation Permit Issuance Date: | Yet to be issued |
| Minor Source Modification No.: | 157-16119-00038 |
| Permit Reviewer: | Dr. Trip Sinha |

The Office of Air Quality (OAQ) has reviewed a modification application from Cargill, Inc. relating to the construction of the following insignificant emission unit and pollution control devices:

- (1) One (1) hexane storage tank, identified as #809 A, with a maximum capacity of 19,000 gallons, and vented to the solvent recovery system in the extraction process or vented through the flame arrester.

Enforcement Issue

There is a pending enforcement action against the company for constructing and operating FDS system. The system has been issued a PSD permit for its FDS process.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

An application for the purposes of this review was received on June 14, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Page 1).

Potential To Emit of Modification

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Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|-----------|-------------------------------|
| VOC | 0.04 |

| HAP's | Potential To Emit (tons/year) |
|----------|-------------------------------|
| n-hexane | 0.027 |
| TOTAL | 0.027 |

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6), because this replacement tank is subject to New Source Performance Standards 40 CFR 60.110b, Part Kb.

County Attainment Status

The source is located in TippeCanoe County.

| Pollutant | Status |
|-----------------|------------|
| PM-10 | Attainment |
| NO ₂ | Attainment |
| SO ₂ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. TippeCanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

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| Pollutant | Emissions (tons/year) |
|-----------|-----------------------|
| VOC | > 250 |

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Submitted application for Title V permit.

Potential to Emit of Modification after Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

| | Potential to Emit (tons/year) | |
|-----------------------|----------------------------------|------|
| Process/facility | VOC | HAPs |
| Hexane Tank | 0.0 | 0.0 |
| PSD Significant Level | 40 | - |

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant level.
- (b) Tank #809A is a replacement of the old process tank, which qualifies as routine maintenance, repair, and replacement under the PSD rules (40 CFR 52.21) and 326 IAC 2-2, and is exempt from the PSD permitting requirements. This replacement tank is not related to the PSD permit issued on December 3, 2002.

Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

326 IAC 12, and 40 CFR 60, Part Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)

The replacement hexane storage tank is subject to the New Source Performance Standard, 326 IAC 12, and 40 CFR 60.110b, Subpart Kb. This rule requires that the owner or operator shall keep readily accessible records showing the dimension; and an analysis showing the capacity of the hexane storage tank (larger than 40 cubic meters (10,568 gallons) in volume) for the life of the source.

40 CFR 63, Subpart GGGG (National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable Oil Production)

The facility under this modification is part of a vegetable oil production process that is a major source of HAP emissions. This source as a whole, is subject to 40 CFR 63, Subpart GGGG (National Emission Standards for Hazardous Air Pollutants: Solvent Extraction for Vegetable

Oil Production). Pursuant to these rules the hexane solvent loss from the specialty soybean process shall not exceed 1.7 gallons per ton of soybean processed.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart GGGG.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR Part 52.21

This replacement tank is determined to qualify as routine maintenance, repair, and replacement and is not subject to 326 IAC 2-2, and 40 CFR Part 52.2, because of the followings:

- (1) Nature and extent – The replacement of a storage tank with a smaller tank does not involve the replacement of numerous major components of the production site;
- (2) Purpose – This tank replacement does not significantly enhance the present efficiency and capacity of the plant. The tank replacement project does not substantially extend the useful economic life of a pharmaceutical plant;
- (3) Cost - A tank replacement is not unusually costly, given the cost of manufacturing equipment. The cost of a new replacement tank is only a small fraction of the cost for an entirely new production source.

State Rule Applicability - Individual Facilities

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This tank is exempt from the rule 326 IAC 8-9, because this tank is subject to 40 CFR 60.110b, Subpart Kb, New Source Performance Standards for Volatile Organic Liquid Storage.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 157-16119-00038.

Appendix A

Emissions Calculation

Most of the emissions related to the solvent storage tank would be from working losses.

Emission estimate assuming no control follows:

$$2.4 \times 10^{-5} * M_v * P * V * N * K_n * K_c = \text{Working Loss}$$

M_v = Molecular wt. = 86

P = 5.2 psia

V = 19,000 gal

N = Tank Turnovers (247,142 gal/19,000 gal) = 13

K_n = Turnover Factor = 1

K_c = Product Factor = 1

= 265 lbs/yr total VOC loss from tank system =

= 169 lb/yr HAP loss tank system

= 132.5 lbs/yr total VOC loss from one of the tank = 0.067 tons/yr

= 85 lb/yr HAP from one of the two tanks = 0.043 tons/yr